

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	CAUSE NO. A-11-CR-438-SS
	§	
AUDREY MONCADA	§	

MEMORANDUM REGARDING MEDICAL CONDITION

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Defendant AUDREY MONCADA, by and through her undersigned attorney, and files this memorandum regarding her current medical condition and need for future treatment.

Audrey Moncada (Saucedo) is a 41 year old female and currently suffers from numerous, serious health issues. Most seriously, Mrs. Moncada has been diagnosed with diastolic heart failure which must be constantly, medically managed. She has been admitted to the hospital as recently as Thursday, February 2, 2012 and, in the last several months, been admitted to ICU for overnight stays on multiple occasions. (See Exhibit A).

Mrs. Moncada is a candidate for the Left Atrial Pressure Monitoring to Optimize Heart Failure Study (LAPTOP-HF) through St. Jude. This study includes a device that will be inserted into Mrs. Moncada much like a pacemaker. Mrs. Moncada will carry a cellular phone sized devise that will allow her medical providers to constantly monitor her heart. Attached as Exhibit A is a February 6, 2012 letter from Carol A. Schauf, RN, MSN, FNP regarding Mrs. Moncada's medical condition and her treatment. Ms. Schauf is of the opinion that Mrs. Moncada requires close medical supervision to prevent hospitalization.

In addition, Mrs. Moncada uses a Bilevel Positive Airway Pressure (BiPAP) when she sleeps and sleeps on a hospital bed at her residence to assist in her breathing while she sleeps. She also uses portable oxygen throughout the normal day. Because of the care she has received and treatment she is undergoing, Mrs. Moncada has not had an overnight stay in the hospital since December 16, 2011. She had one overnight stay of varying durations in each month from September to December of 2011.

Conclusion

Mrs. Moncada is requesting that her sentence be such that there will be no lapse in her medical treatment so as to not increase her risk of hospitalization that can be prevented by the care that she is currently receiving and for which she is a candidate. If incarceration is part of her sentence, she requests that she be allowed to report in a month from the date of the sentencing hearing so that her medical providers can have time to better prepare her for the period of incarceration.

Respectfully submitted,

SHOTTS, TREVINO & GUEVARA, LLP

By: 

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of February, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Mr. Daniel D. Guess
Assistant U.S. Attorney
816 Congress Ave., Ste. 1000
Austin, TX 78701

A handwritten signature in blue ink that reads "Michael A. Guevara". The signature is written in a cursive style with a horizontal line underneath it.

Michael A. Guevara